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April 13, 2022

BY ECF

Hon. Stewart D. Aaron
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 1970
New York, NY 10007

**Re: *United States of America and States of the United States, ex rel.
Donohue v. Richard Carranza, et al.*, 1:20-CV-5396 (GHW)**

Dear Judge Aaron:

This firm, along with the New York City Law Department, represents defendants New York City Department of Education and former Chancellors Carranza and Porter; this firm also represents defendants Board of Education of the City of Chicago (identified as the Chicago Public School District in Relator's Second Amended Complaint) and former Superintendent Torres, and Los Angeles Unified School District and former Superintendent Beutner (together, the "School Districts") in the above-referenced case.

Pursuant to Your Honor's order dated April 8, 2022 (ECF No. 123), counsel for the School Districts and Relator have conferred and jointly propose the briefing schedule set forth below for the School Districts' anticipated motion to dismiss Relator's Second Amended Complaint (ECF No. 19):

School Districts' Brief in support of motion to dismiss:	May 27, 2022
Relator's Brief in opposition to motion to dismiss:	June 27, 2022
School Districts' Reply Brief:	July 29, 2022

Respectfully,

/s/ Joseph V. Willey
Joseph V. Willey

Cc: All counsel of record, via ECF